

Rossendale Borough Council STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT: VOLUME 1



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Main Report
February 2009

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Foreword

This document is the first Strategic Housing Land Availability Assessment (SHLAA) for Rossendale. The SHLAA considers the potential supply of housing across the Borough over a 15 year period from a base date of April 2008. The SHLAA is a technical study of housing potential, working on the best available information at a point in time; this means it is not necessarily fully inclusive.

Between April 2008 and the publication of the final report, it is likely that some circumstances will have changed such as, for instance, resolutions to grant planning permission on particular sites. The SHLAA will be updated annually to ensure that the assumptions within it and the estimates of supply are as up to date as possible.

The SHLAA forms part of the Local Development Framework (LDF) evidence base, along with a range of other technical studies. It does not in any way prejudice decisions to be taken by the Borough Council in relation to preferred directions of growth, site identification in Development Plan Documents (DPDs) or the determination of planning applications.

Rossendale Borough Council will use the SHLAA as a starting point for its consideration of which sites to bring forward as allocations in the Site Allocations DPD. Considerable further work will be required in order to ensure that the identification of sites in the Site Allocations DPD is based on sound and up to date information.

If you have more up to date information that you feel will be relevant to the first annual SHLAA update, and would help in analysing the full potential of any site, please contact the Council's Forward Planning Team on (tel) 01706 252417.

Rossendale Borough Council

Glossary

Abbreviation	
AAP	Area Action Plan
CFS	Call for Sites
CIL	Community Infrastructure Levy
CLG	Communities and Local Government
CLCR	Central Lancashire City Region
DPD	Development Plan Documents
DPH	Dwellings per Hectare
HMR	Housing Market Renewal
IHPS	Interim Housing Policy Statement
JLSP	Joint Lancashire Structure Plan
LDDs	Local Development Plans
LDFs	Local Development Framework
LPA	Local Planning Authority
NLUD	National Land Use Database
PDL	Previously Developed Land
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RPG	Regional Planning Guidance
RSS	Regional Spatial Strategy
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
UPS	Urban Potential Study

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1 PURPOSE OF THE STUDY, STAKEHOLDER INVOLVEMENT AND STRUCTURE OF OUR REPORT

Purpose of the Study

- 1.1 In August 2008, Roger Tym & Partners was commissioned by Rossendale Borough Council to undertake a Strategic Housing Land Availability Assessment (SHLAA) across the Borough. The purpose of the study is to establish whether there are sufficient suitable sites that are currently available (or likely to become available in the foreseeable future), which could meet the Council's dwelling targets as prescribed by the recently adopted North West Regional Spatial Strategy.
- 1.2 As well as sites which already had planning permission for housing at the study base date (1 April 2008), we have assessed more than 400 additional sites in terms of their 'suitability', 'availability' and 'achievability' for housing development, in accordance with the CLG's SHLAA Practice Guidance of July 2007¹.
- 1.3 The outputs from the SHLAA study will provide the Council with information on a range of potential housing sites - covering both greenfield and previously developed land - and an indication of how its dwelling targets could potentially be met. This evidence can then be used to inform the Council's LDF Core Strategy and Site Allocations DPDs.
- 1.4 **It is important to emphasise that the SHLAA is a technical study to inform decisions on allocating sites. A site's inclusion in the SHLAA does not in itself determine whether a site should be allocated for housing development and it does not guarantee planning permission for housing development.**

Stakeholder Involvement

- 1.5 Reflecting advice in the Guidance that stakeholders should be engaged in the SHLAA process from the outset, we have undertaken a range of consultation exercises to inform the study, as detailed below.

Consultation on the Study Methodology

- 1.6 As indicated above, the study has been undertaken in accordance with CLG's Practice Guidance. Furthermore, the Borough Council invited comments on the methodology set out in the Guidance, with feedback requested by Wednesday 1 October 2008. The Council did not receive any responses to the consultation that questioned the methodology and so there was no need to amend our approach to the study.

Stakeholder Seminars

- 1.7 A first seminar was held on Wednesday 22 October 2008 at Hardmans Mill in Rawtenstall, attended by those who had responded to the Council's invitation to join a 'Stakeholder Advisory Group' for the SHLAA. As well as officers from the Borough Council and the Council's Portfolio Holder for Regeneration, the seminar was attended by a range of external stakeholders including developers and house builders. The purpose of the event was to brief stakeholders on the study objectives, and describe/discuss our approach to the study and technical inputs/assumptions. Following our briefing, we discussed the study process and technical inputs in detail with the seminar attendees.

¹ Hereafter referred to as 'the Guidance'.

- 1.8 We presented our emerging study findings to members of the Stakeholder Advisory Group on Tuesday 16 December, again at Hardmans Mill in Rawtenstall. Our study findings were generally well-received by attendees. The Group made several useful comments and requests, which we have incorporated into our report.

Call for Sites

- 1.9 The Council conducted a 'call for sites' (CFS) exercise during February and March 2008 to inform the Site Allocations DPD. Information on potential housing sites was requested from an extensive list of consultees, including: landowners, housebuilders, developers, planning consultants, architects, agents and housing associations. Accordingly, there was no need for us to undertake a fresh CFS exercise as part of the SHLAA, although of course we have considered the sites submitted as part of the Council's recent CFS exercise.

Consultation with Strategic Public Sector Bodies and Utilities Providers

- 1.10 Early in the study we consulted with a range of strategic public sector bodies such as the Environment Agency North West and Natural England in order to identify any particular constraints that may have a bearing on the delivery of housing in Rossendale. We have consulted with utilities providers, to establish whether there are any significant utilities capacity issues in the Borough that we should be aware of.

Consultations with Local Estate Agents

- 1.11 We met a range of local estate agents early in the study with a view to identifying any particular, locally specific housing-related issues in any parts of the Borough. We used the intelligence gained from these consultations when we assessed the 'achievability' of sites. It is important to emphasise at the outset that our achievability assessments, and the study generally, have been undertaken as if we are operating in normal market conditions. By 'normal' market conditions we mean a period of around 2-3 years when there has been a stable availability of finance.

Liaison with Council Officers

- 1.12 As well as the consultations outlined above, we have also liaised closely with Council officers throughout the study.
- 1.13 All of the very useful and informative dialogue - both with Council officers and the various stakeholders - has informed our work and has helped to ensure that the study outputs are as robust as possible. We submitted our draft final report and associated volumes/other outputs to the Council in December 2008. In finalising our outputs we have taken account of the very constructive feedback that we received following extensive checking of the draft study outputs by the Borough Council.

Structure of Our Report

- 1.14 Following this introduction, the remainder of our report is structured as follows:
- Section 2 contains a review of the national and regional planning policy contexts, as well as the Practice Guidance which dictates how SHLAAs should be undertaken.
 - Section 3 provides a review of the local planning policy context, and a summary of local housing market conditions which draws upon data collected from Rossendale's Housing Strategy (2005-2008) and Lancashire County Council, our own primary research, and information on the local property market obtained through consultations with estate agents.
 - Section 4 provides details of our methodology, including the study parameters and the sources of data used to identify potential housing sites. This section also provides details of our sites database, which contains comprehensive details for each site that we assessed in the study.

- Section 5 sets out details of housing ‘commitments’ in the Borough - that is, sites within the study area that already benefit from planning permission for residential use - and assesses whether there has been an under- or over-supply against the RSS dwelling targets since April 2003.
- Section 6 contains details of how we categorised the sites that we assessed, and then sets out the number of sites in each category and their potential combined yield.
- Section 7 then sets out the potential that could contribute to housing supply over the next 15 years, from sites with planning permission and other sites identified in the SHLAA as potentially suitable for housing.
- Section 8 then summarises the main findings from the SHLAA.

1.15 Our overall study outputs are as follows:

- Volume 1 - ‘Main Report’;
- Volume 2 - ‘Appendices to the Main Report’², which contains the following:
 - Appendix 1 - Residential Market Commentary Paper
 - Appendix 2 - Assessment Factors and Criteria Used to Assess Sites’ Housing Potential
 - Appendix 3 - Schedule of Category 1 Sites
 - Appendix 4 - Schedule of Category 2 Sites
 - Appendix 5 - Schedule of Category 3 Sites
 - Appendix 6 - Spatial Distribution of Category 1, Category 2 and Category 3 Sites
- the Microsoft Access Sites Database, which contains details of the 426 sites that we visited and assessed; and
- a MapInfo GIS layer which contains digitised polygons for all of the sites that are contained in our Sites Database.

² Any references in our report to ‘Appendices’ relate to the Appendices that are contained in Volume 2.

2 THE REQUIREMENTS OF NATIONAL AND REGIONAL POLICY

Planning Policy Statement 1 (January 2005): Delivering Sustainable Development

- 2.1 PPS1 sets out overarching strategic planning policies, including the contribution that the planning system can make to the delivery of sustainable development, which is the core principle underpinning planning.
- 2.2 A key objective of PPS1 is to ensure that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities. Paragraph 27 sets out the general approach to delivering sustainable development; planning authorities should seek to:
- bring forward sufficient land of a suitable quality in appropriate locations to meet the expected needs for housing;
 - reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development; and
 - promote the use of suitably located vacant and underused previously developed land (PDL) in order to achieve Government targets.

Planning Policy Statement 3 (November 2006): Housing

- 2.3 PPS3 replaced the previous PPG3 as the statement of the national planning policy framework for delivering the Government's housing objectives. PPS3 establishes the requirement for LPAs to undertake SHLAAs which replace the housing capacity studies required under PPG3. It specifies in Annex C that a SHLAA should:
- *'Assess the likely level of housing that could be provided if unimplemented planning permissions were brought into development.*
 - *Assess land availability by identifying buildings or areas of land (including previously developed and greenfield land) that have development potential for housing, including within mixed use developments.*
 - *Assess the potential level of housing that can be provided on identified land.*
 - *Where appropriate, evaluate past trends in windfall land coming forward for development and estimate the likely future implementation rate.*
 - *Identify constraints that might make a particular site unavailable and/or unviable for development.*
 - *Identify sustainability issues and physical constraints that might make a site unsuitable for development.*
 - *Identify what action could be taken to overcome constraints on particular sites.'*
- 2.4 PPS3 states that LPAs should set out in Local Development Documents (LDDs) their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption, taking account of the level of housing provision set out in the RSS.
- 2.5 One of the key differences between PPS3 and PPG3 is that windfall allowances should no longer be included in the first 10 years of land supply in LDFs, unless there are *'genuine local circumstances that prevent specific sites being identified'* (PPS3 paragraph 59). This places greater emphasis on the need to identify sites which can be confidently allocated for housing in LDFs.

- 2.6 PPS3 reiterates the previous PPG3 policy that the priority for development should be PDL - in particular vacant and derelict sites and buildings - and it requires LPAs to ensure that sufficient, suitable land is available to achieve their PDL delivery objectives. However, unlike housing capacity studies under PPG3, SHLAAs are required to consider the potential of greenfield sites to deliver housing, as well as PDL.
- 2.7 PPS3 states that LDDs should include a local PDL target and trajectory, and strategies for bringing PDL into housing use. Where appropriate, the trajectory could be divided up to reflect the contribution expected from different categories of PDL - for example, vacant and derelict sites - in order to deliver the spatial vision for the area in the most sustainable way. In developing their PDL strategies, LPAs are advised (in paragraph 44) that they:
- 'should consider a range of incentives or interventions that could help to ensure that previously developed land is developed in line with the trajectory/ies. This should include:*
- *planning to address obstacles to the development of vacant and derelict sites and buildings, for example, use of compulsory purchase powers where that would help resolve land ownership or assembly issues.*
 - *considering whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development.*
 - *encouraging innovative housing schemes that make effective use of public sector previously-developed land.'*
- 2.8 The content of PPS3, as summarised above, has clear implications for the information to be included and assessed in a SHLAA.

Planning Policy Statement 12 (June 2008): Local Spatial Planning

- 2.9 This study will form part of the evidence base upon which the Council will draw in developing its LDF and, in particular, its Core Strategy and Site Allocations DPDs. Section 4 of the new PPS12 explains the intended nature of core strategies, gives advice on their preparation and introduces a new test of soundness. For the purposes of this report, we focus on the nature of core strategies and the test of soundness, rather than on the preparation process.
- Nature of Core Strategies*
- 2.10 Paragraph 4.1 of PPS12 requires that each core strategy must include:
- i) an overall **vision** which sets out how the area and the places within it should develop;
 - ii) **strategic objectives** for the area, focusing on the key issues to be addressed;
 - iii) a **delivery strategy** for achieving these objectives, which should set out how much development is intended to happen, where, when and by what means it will be delivered and with locations for strategic development indicated on a key diagram; and
 - iv) clear arrangements for **managing and monitoring** the delivery of the strategy.
- 2.11 In turn, the 'vision' should be in general conformity with the RSS and closely relate to the Sustainable Community Strategy (paragraph 4.2 of PPS12), and the 'strategic objectives' should form the link between the 'vision' and the 'delivery strategy' (paragraph 4.3 of PPS12).
- 2.12 PPS12 then emphasises that it is the delivery strategy which is central to the process. Paragraphs 4.4 and 4.5 indicate that the delivery strategy must:

- v) show how the objectives will be delivered, whether through actions taken by the Council as a planning authority, or through actions taken by other parts of the Council, or other bodies;
- vi) set out, as far as practicable, when, where, and by whom these actions will take place;
- vii) demonstrate that the agencies/partners necessary for its delivery have been involved in its preparation and that the resources that are required have been given due consideration;
- viii) have a realistic prospect of being provided in the life of the core strategy; and
- ix) make clear spatial choices about where developments should go in broad terms.

Strategic sites

- 2.13 Paragraph 4.6 of PPS12 states that core strategies may allocate strategic sites for development, provided these sites are ‘...*considered central to achievement of the strategy*’; the strategy should not be held up by the inclusion of non-strategic sites. Where core strategies do allocate strategic sites, they must include a submission proposals map, but preferably with the sites delineated in outline, rather than in detailed terms (paragraph 4.7 of PPS12).

Infrastructure

- 2.14 Paragraph 4.8 of PPS12 states that:

‘The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided.’

- 2.15 Thus, the infrastructure planning process that forms part of the evidence base to the core strategy should identify, as far as possible:

- i) infrastructure needs and costs;
- ii) phasing of development;
- iii) funding sources; and
- iv) responsibilities for delivery.

- 2.16 Paragraph 4.10 makes it plain that the core strategy should make proper provision for uncertainty and not place reliance on critical elements of infrastructure whose funding is unknown; it states that:

‘The test should be whether there is a reasonable prospect of provision. Contingency planning - showing how the objectives will be achieved under different scenarios - may be necessary in circumstances where provision is uncertain.’

- 2.17 Paragraphs 4.11 and 4.12 of PPS12 make it clear that there is a need to identify the infrastructure requirements of any strategic sites and that the core strategy should include policies for charging the Community Infrastructure Levy (CIL), in anticipation of when such powers come into effect.

Period of operation

- 2.18 The time horizon of a core strategy should be at least 15 years from the date of its adoption. The strategy should build in flexibility by considering the implications of different levels of development, so as to reduce the risk of unnecessary updates.

Test of Soundness

- 2.19 Paragraph 4.54 of PPS12 introduces a new test of ‘soundness’ for core strategies, as follows:

‘To be “sound” a core strategy should be justified, effective and consistent with national policy.

“Justified” means that the document must be:

- *founded on a robust and credible evidence base*
- *the most appropriate strategy when considered against the reasonable alternatives.*

“Effective” means that the document must be:

- *deliverable*
- *flexible*
- *able to be monitored’*

- 2.20 Thus, PPS12 places more emphasis on the need for development plan documents to:
- i) *‘...demonstrate that the plan is the most appropriate, when considered against reasonable alternatives.’* (Paragraph 4.38 of PPS12, our emphasis); and
 - ii) *‘...show how the vision, objectives and strategy for the area will be delivered and by whom, and when.’* (Paragraph 4.45 of PPS12, our emphasis).
- 2.21 Paragraph 5.12 of PPS12 confirms that the test of soundness for ‘other’ DPDs is the same as the soundness test for core strategies.

SHLAA Practice Guidance (July 2007)

- 2.22 Practice Guidance for undertaking SHLAAs was published by Communities and Local Government (CLG) in July 2007³. It supersedes the advice in the previous guidance entitled ‘Tapping the Potential’⁴, which related to housing capacity studies.
- 2.23 In paragraph 1, the Guidance states that SHLAAs are *‘a key component of the evidence base to support the delivery of sufficient land for housing to meet the community’s need for more homes’*. The Guidance emphasises that a SHLAA is significantly different from a housing capacity study, and if a recent capacity study has been carried out, further work will be needed to fulfill the requirements of the SHLAA.
- 2.24 The Guidance states that the primary role of the SHLAA is to:
- identify sites with potential for housing;
 - assess their housing potential; and
 - assess when they are likely to be developed.
- 2.25 A SHLAA should aim to identify as many sites with housing potential in and around as many settlements as possible in the study area. The study area should preferably be a sub-regional housing market area, but may be an LPA area, where necessary. As a minimum, the SHLAA should aim to identify sufficient specific sites for at least the first 10 years of a plan, from the anticipated date of its adoption, and ideally for longer than the whole 15 year plan period⁵. Where it is not possible to identify sufficient sites, the SHLAA should provide the evidence base to support judgements around whether broad locations should be identified and/or whether there are *‘genuine local*

³ Hereafter referred to simply as ‘the Guidance’.

⁴ DETR, December 2000.

⁵ The CLG consultation document ‘Streamlining Local Development Frameworks’ (November 2007) suggests extending the lifespan of LDF Core Strategies from 10 to 15 years. This will increase compatibility with the requirements of PPS3, which directs LPAs to identify broad locations and specific sites on which to deliver housing for at least 15 years.

circumstances that mean a windfall allowance may be justified in the first 10 years of the plan⁶.

- 2.26 Paragraph 8 makes it clear that whilst the assessment is an important evidence source to inform plan-making, it does not in itself determine whether a site should be allocated for housing development. The Guidance also states that the SHLAA should be kept up to date as part of the Annual Monitoring Report exercise, so as to support the updating of the housing trajectory and the five-year supply of specific deliverable sites.
- 2.27 The Guidance provides details on the methodology for a SHLAA which has eight main stages, and two further optional stages covering broad locations and windfalls. The stages are as follows:
- Stage 1: Planning the Assessment;
 - Stage 2: Determining which sources of sites will be included in the Assessment;
 - Stage 3: Desktop review of existing information;
 - Stage 4: Determining which sites and areas will be surveyed;
 - Stage 5: Carrying out the survey;
 - Stage 6: Estimating the housing potential of each site;
 - Stage 7: Assessing when and whether sites are likely to be developed;
 - Stage 8: Review of the Assessment;
 - Stage 9: Identifying and assessing the housing potential of broad locations (when necessary); and
 - Stage 10: Determining the housing potential of windfalls (where justified).
- 2.28 Stage 2 lists the sources of sites with potential for housing, which consist of sites currently in the planning process as well as those that are not in the planning process, namely:
- allocated employment or other land uses which are no longer required for those uses;
 - existing housing allocations, which have not yet been implemented;
 - unimplemented/outstanding planning permissions for housing; and
 - planning permissions for housing that are under construction.
- 2.29 Stage 7 assesses when and whether sites are likely to be developed. Central to this is the consideration of whether sites are suitable, deliverable and developable for housing. Suitability embraces policy restrictions, physical problems/limitations (for instance access, infrastructure, flood risk, ground conditions and contamination), potential impacts (upon the landscape and conservation) and the environmental conditions which would be experienced by prospective residents.
- 2.30 Availability considers, *'on best information available'* (paragraph 39 of the Guidance), whether there are any legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. Achievability is essentially a judgment about the economic viability of a site. It will be affected by market factors, cost factors (including site preparation costs relating to any physical constraints) and delivery factors (including phasing and build-out rates, which mostly concerns larger sites).
- 2.31 Stage 10 relates to determining the housing potential of windfall sites, where an allowance can be justified. Any allowance for windfalls should be based on an

⁶ The term *'genuine local circumstances'* used in paragraphs 7 and 50 of the Guidance is the same term that is used in paragraph 59 of PPS3.

estimate of the amount of housing that could be delivered in the area on land that has not been identified in the list of deliverable/developable sites, or as part of broad locations for housing development. One method to estimate potential from each source is by calculating the average annual completion rate from the source, taking care to avoid double counting sites which are already included in the assessment, and coming to an informed view as to:

- whether the annual rate is likely to increase or decrease;
- whether the pattern of redevelopment is likely to remain the same, grow or decline; and
- whether current market conditions are likely to stay the same, worsen or improve in the future.

2.32 We cover the SHLAA methodology in greater detail in subsequent sections of our report.

North West of England Plan - Regional Spatial Strategy to 2021 (September 2008)

- 2.33 The North West of England Plan (the RSS) replaces Regional Planning Guidance for the North West (RPG13) and the Joint Lancashire Structure Plan (JLSP). The RSS provides a framework for development and investment in the region in the period up to 2021.
- 2.34 The RSS divides the region into five sub-regions (Manchester City Region; Liverpool City Region; Central Lancashire City Region; Cumbria and North Lancashire; and South Cheshire). Rossendale is located within the Central Lancashire City Region (CLCR), and Policies CLCR1 and CLCR2 state that plans and strategies for the CLCR should *'provide for a range of good quality housing, accessible for local facilities'*, and prioritise the Elevate East Lancashire Housing Market Renewal Pathfinder area (which includes Bacup, Stacksteads and Britannia).
- 2.35 Section 7 of the RSS sets out regional housing provision figures for the period 2003 to 2021. Table 7.1 specifies a requirement for 4,000 dwellings (net of clearance replacement) in Rossendale over this period, which equates to an average net gain per annum of 222 dwellings. Furthermore, the RSS (Table 7.1) sets a target that at least 65 per cent of residential development should use brownfield land and buildings.
- 2.36 Importantly, paragraph 7.19 explains that the housing provision figures set out in the RSS should no longer represent maximum thresholds or 'absolute targets'. Thus, in line with the 'plan, monitor, manage' approach which underpins PPS3, the RSS lays the foundations for a more flexible approach to housing provision at the local level, explaining that local authorities can introduce phasing policies and that the annual housing figures may be *exceeded*, *'where justified by evidence of need, demand, affordability and sustainability issues and fit with relevant local and sub-regional strategies'*. Conversely, the RSS also states that *'some areas will achieve lower levels [of housing provision] in the early years, for example during major housing renewal, which will be compensated later.'*
- 2.37 The flexibility described above has important implications for the 5, 10 and 15-year dwelling requirements of Rossendale. There is a need to take account of any under-provision against the RSS targets since the 2003 base date of the RSS. We return to these issues in Section 5, although Table 2.1 shows what the 5, 10 and 15-year dwelling requirements would be if the RSS rate of 222 dwellings per annum was applied as an average rate across each of the forthcoming five-year periods.

Table 2.1 Rossendale 5, 10 and 15-Year Dwelling Requirements (Based on the RSS Figures as an Average Across Each Five-Year Period)

Avg Dwellings/yr (same average across each 5-year period) ^a	5-Year Dwelling Requirement	10-Year Dwelling Requirement	15-Year Dwelling Requirement
222	1,110	2,220	3,330

^a The 15-year requirement assumes that the RSS target of 222 dwellings per annum will continue for a limited period beyond 2021, in accordance with the final sentence of Policy L4.

Summary

- 2.38 Sustainable development is the core principle underpinning planning, and national planning policy guidance/statements emphasise the Government's objective of ensuring the delivery of more sustainable patterns of development. To this end, LPAs are required to identify in their LDDs sufficient, suitable land in appropriate locations to enable the continuous delivery of housing for at least 15 years from the date of adoption, and they are charged with promoting the reuse of vacant and underused PDL.
- 2.39 SHLAA studies are an important evidence source to inform plan-making, by identifying whether there are sufficient specific sites (both greenfield and PDL) that are capable of meeting the LPA's housing requirements. However, the Practice Guidance makes clear that the SHLAA will not in itself determine whether a site should be allocated for housing development.
- 2.40 The Government's core objective of ensuring more sustainable patterns of development is reflected in regional planning policy, which seeks to concentrate most new development within the regional centres and their inner urban areas. The RSS aims to *'provide for a range of good quality housing, accessible for local facilities'*, and prioritises the Elevate Housing Market Renewal Pathfinder area (which includes Bacup, Stacksteads and Britannia).
- 2.41 The dwelling target for Rossendale set out in the RSS represents an increase on the requirements specified in the now-superseded JLSP. This has clear implications for the amount of land that will need to be identified for housing in the Council's emerging LDF.
- 2.42 Furthermore, the RSS advocates that housing provision figures set out in the RSS should no longer represent maximum thresholds, and lays the foundations for a more flexible approach to housing provision at the local level.

3 LOCAL POLICY CONTEXT AND SUMMARY OF LOCAL HOUSING MARKET CONDITIONS

Rossendale Local Plan (April 2005)

- 3.1 The Rossendale Local Plan was adopted in April 1995 and was originally intended to guide development in the Borough up to 2001, although a number of the Plan policies have been saved under the provisions of the Planning and Compulsory Purchase Act 2004, pending the adoption of the new Local Development Framework. Nevertheless, the policies contained in the Local Plan were adopted some thirteen years ago and so, as with the JLSP, we do not consider it necessary to provide a comprehensive review of the Local Plan in this report.

Rossendale Borough Council Interim Housing Policy Statement (July 2008)

- 3.2 The 2008 Interim Housing Policy Statement (IHPS) provides guidance on how the Council intends to manage the release of housing land prior to the adoption of the emerging LDF, and replaces the previous IHPS published in December 2007. The 2007 IHPS was produced to address concern over the oversupply of housing against the JLSP requirements, and the need to consider regeneration priorities and the delivery of affordable housing in the Borough. Thus, the main aims of the previous IHPS were to (i) manage the overall rate at which planning permissions were granted for new housing in order to bring rates of housing completions more in line with strategic requirements in the JLSP; and (ii) focus development in the Regeneration Priority Areas of Rawtenstall Town Centre and the Bacup, Stacksteads and Britannia Elevate Pathfinder area.
- 3.3 However, the IHPS has now been revised in response to the housing targets set out in the recently published RSS, which at an average annual rate of 222 dwellings is significantly higher than the rate of 80 dwellings per annum in the now superseded JLSP. The 2008 IHPS therefore states that the Council will *'encourage and promote residential development'* under the following circumstances:
- within Regeneration Priority Areas and Main Development Locations⁷, where the scheme uses PDL, makes a contribution towards affordable housing provision, and is built at a density of between 30 and 50 dph;
 - within the urban boundary of other settlements in Rossendale, provided the scheme is on PDL, makes a contribution towards affordable housing provision, is built at a density of no less than 30 dph, and would not undermine the focus for most residential development to be within the Regeneration Priority Areas and Main Development Locations; and
 - outside the urban boundary of other settlements in Rossendale, provided that proposals are for solely affordable and/or special needs housing, or where the accommodation is for agricultural or forestry workers.
- 3.4 The 2008 IHPS also sets out the Council's approach to affordable housing, and seeks to obtain 20 per cent affordable housing on proposals for 15 or more dwellings within the Regeneration Priority Areas of Rawtenstall Town Centre and the Bacup, Stacksteads and Britannia HMR area. Development outside of these areas will be subject to affordable housing requirements based on the number of dwellings.

⁷ The Main Development Locations are defined on the map in Appendix C of the 2008 version of the IHPS; however, specific settlements/areas are not defined on the map, which instead identifies most of the Borough's urban area as Main Development Locations.

Rossendale Local Development Framework

Rossendale Core Strategy and Rawtenstall Area Action Plan Preferred Options Addendum Report (October 2006)

- 3.5 Between April and May 2006, Rossendale Borough Council consulted on its Core Strategy Preferred Options Report and the Rawtenstall Area Action Plan (AAP) Revised Preferred Options document. The Government Office for the North West requested that the Council undertake additional consultation to describe the options that had been considered but not taken forward as Preferred Options in these two documents, in order to meet the Planning Inspectorate's test of soundness. As such, the Core Strategy and Rawtenstall AAP Preferred Options Addendum Report was published in October 2006, and sets out the rationale for the selection of the Core Strategy and Rawtenstall AAP Preferred Options.
- 3.6 The Core Strategy vision is to provide greater opportunities for local people to live in high quality housing in an environment that meets their needs. The Preferred Options report thus indicates that:
- Rawtenstall should be the main town in Rossendale, with Haslingden, Bacup and Whitworth as local service centres;
 - priority should be given to development in Rawtenstall, followed by Haslingden and Bacup, then in all other areas within the urban boundary;
 - comprehensive regeneration strategies and action plans should be developed for areas with significant housing market issues, including the Elevate HMR area (Bacup, Stacksteads and Britannia); and
 - priority for development should be given to areas with the highest levels of social deprivation.
- 3.7 The overall vision for Rawtenstall town centre is that it will be '*developed as Rossendale's principal town centre, fulfilling its role as a Gateway to the Sub-Region, County and Borough*'.

Housing Market Renewal Pathfinder Initiative

Bacup, Stacksteads and Britannia 'Elevate' East Lancashire Housing Market Renewal (HMR) Pathfinder

- 3.8 HMR is a Government initiative designed to tackle the problems caused by failure in the private sector housing market in parts of the Midlands and Northern England. Elevate East Lancashire was one of nine HMR 'Pathfinder' areas introduced by the Government in April 2002, with the aim of tackling the most acute areas of low housing demand and abandonment, and covers failing neighbourhoods in Rossendale, as well as Blackburn with Darwen, Burnley, Hyndburn, and Pendle. The central strand of the Elevate East Lancashire programme is to focus on improving the quality, affordability and diversity of the housing stock in order to widen the choice of housing to serve the needs of existing and new residents.
- 3.9 Rossendale Borough Council was invited to become part of the Elevate Partnership in 2003, and an AAP for Bacup, Stacksteads and Britannia is currently being prepared. The emerging AAP sets out a development framework for the area over a 10 to 15 year period, and will provide a masterplan to guide regeneration in the area. The AAP envisages that there will be some selective clearance of properties in the worst condition, but this will be combined with new initiatives to revitalise and refurbish existing stock and provide sufficient affordable housing in new build schemes. There are also plans to develop Bacup as an '*exemplar Eco-town*'.

Key Findings from our Review of Local Housing Market Conditions

Introduction

- 3.10 Early in the study, we undertook a review of the local housing market in Rossendale, to set the context for the assessment of sites' 'achievability'. The full findings are contained in the Residential Market Commentary Paper, which is provided as Appendix 1. Below, we provide a summary of the key findings from our Paper.
- 3.11 Our Paper draws upon data collected from Rossendale's Housing Strategy (2005-2008) and Lancashire County Council, our own primary research, and information on the local property market obtained through consultations with estate agents.

The Study Area

- 3.12 There are 39 settlements within Rossendale Borough, which together accommodate around 29,574 residential properties⁸. Rawtenstall is the largest settlement, with a resident population of around 22,000 (in 2001). Bacup and Haslingden are the next-biggest settlements, with populations of over 10,000 people. Whitworth and Edenfield are also relatively significant settlements, albeit not quite as populous as their larger neighbours. The remaining 34 settlements that we identified each has a resident population of less than 1,000.
- 3.13 The distribution of population within the Borough is highly uneven, with the towns and villages of Rossendale being packed densely together in the steep-sided valleys of the River Irwell, whilst being surrounded by expanses of almost completely unpopulated moorland. Indeed, the topography of Rossendale is a significant challenge to finding potential sites for residential development in the Borough.

Housing Stock

- 3.14 There is a wide variety of housing stock in Rossendale Borough, from farm houses, barn conversions, and pre-1900 stone-built terraces, through to more modern, large detached properties and apartments.
- 3.15 Notwithstanding this, a significant proportion of the local population live in terraced property (40 per cent), compared to the national average of 26 per cent. However, local estate agents explained that the terraced housing stock is generally popular. People relocating to Rossendale from outside the Borough are often attracted by the older terraced properties, which can offer original period features and open aspects; whilst first-time buyers within the Borough seek out terraced property which is relatively spacious and cheap to purchase.
- 3.16 Local estate agents do not, therefore, consider there to be a significant oversupply of terraced housing within the Borough. The agents we consulted were more concerned about the quantum of apartments within Rossendale, for which there is limited demand.
- 3.17 The estate agents did, however, consider there to be an under-supply of large, modern family homes within the Borough. There is a limited property choice available for families, and a specific deficiency of semi-detached/detached property with three bedrooms, parking and a garden, and superior modern detached housing.

Affordable Housing

- 3.18 Although there is currently not an acute 'affordability' crisis in Rossendale, affordability is a rising concern. This is despite the fact that housing stock in Rossendale is generally lower in price than comparable properties in many other parts of the region and country. Indeed, house price data collected by Communities and Local

⁸ HMR & Strategy Property Database, October 2004

Government indicates that Rossendale is the 39th cheapest house price area in the country, with an average residential property price of £139,781 in 2007⁹. However, although house prices are relatively low, the weekly earnings of residents living in Rossendale are also quite low. Rossendale employees' gross weekly pay of £416.90 is 10 per cent less than the national average weekly earnings (£462.60)¹⁰.

Areas of High, Moderate and Low Demand

3.19 In Table 3.1 below, we highlight the settlements within Rossendale that local estate agents identified as areas of high, moderate and low demand, from the perspective of prospective purchasers.

Table 3.1 Areas of High, Moderate and Low Demand in Rossendale

Settlement	Estate Agent Comments
High Demand	
Rawtenstall	Rawtenstall, together with settlements located within a two mile radius of the town, are popular, primarily because of the close proximity to the motorway network. Rawtenstall also benefits from a good array of local amenities.
Waterfoot	Benefits from a respectable grammar school.
Helmshore and Edenfield	Benefit from close proximity to the A56/M66, whilst retaining the character of traditional villages.
Crawshawbooth, Cloughfold and Newchurch	Benefit from close proximity to the grammar school at Waterfoot, and the national motorway network.
Moderate Demand	
Haslingden	Benefits from good proximity to the motorway network, but the town centre appears rundown and lacks sufficient amenities.
Whitworth	Moderate demand, although the town suffers from poor connectivity with the motorway network.
Townsend Fold	Located close to the motorway network and the steam railway station.
Whitwell Bottom	Increased in popularity recently, due to new development in the area.
Low Demand	
Bacup and Stacksteads	These towns are served by only one main road (which is often congested), and they suffer from poor connectivity to the primary road network and a poor physical environment.

⁹ Rank out of 376 authorities across England and Wales, where 1 is the cheapest house price area and 376 is the most expensive.

¹⁰ Nomis, *Annual Survey of Hours and Earnings (Resident Analysis)*, 2007

- 3.20 There is thus a distinct division between demand for housing towards the east of the Borough, and demand for housing towards the west. Local estate agents explained that the difference in demand is largely due to the preferential transport connections towards the west of the Borough, where Rawtenstall and the surrounding villages benefit from easy access to the A56, M66 and M65.

Summary

- 3.21 A number of the Borough Council's Local Plan policies will remain 'saved' pending completion of the LDF, although these are now out of date. Consequently, the Council has issued an updated Interim Housing Policy Statement (July 2008) which provides guidance on the release of housing land in light of the higher dwelling targets set out in the recently adopted RSS. The IHPS, in line with the Council's emerging Core Strategy and AAP for Rawtenstall, encourages residential development within Main Development Locations and Regeneration Priority Areas.
- 3.22 Another central priority of the emerging Core Strategy is to support the HMR Pathfinder in Bacup, Stacksteads and Britannia. Indeed, a central issue for the Core Strategy's housing policy will be to achieve a balance between strengthening areas with weak housing markets (such as the HMR area), and ensuring the delivery of enough new housing to fulfil strategic policy requirements. This may, however, be challenging given the topographical and infrastructure constraints that we have referred to above, as well as the negative perception of some settlements towards the east of the Borough.

4 METHODOLOGY AND DATA SOURCES

Parameters

Study Area

- 4.1 The SHLAA study covers the entire area within the administrative boundary of Rossendale Borough Council.

Settlements Where We Conducted a Search for Sites

- 4.2 As we noted in Section 3, whilst Rossendale contains a relatively small number of settlements (39), few of them are remote from services because they are located close together either within the steep-sided valleys of the River Irwell, or on the main north-south routes which radiate from the valley. Furthermore, the Borough's towns and villages are surrounded by expanses of almost completely unpopulated moorland, and the topography of Rossendale is a significant challenge to finding potential sites for residential development in the Borough.
- 4.3 For the above reasons, it was agreed early in the study that we would take a comprehensive approach and consider sites within or adjacent to any of the Borough's 39 settlements.
- 4.4 Our approach is therefore extensive, which is necessary in order to fully assess the potential to achieve the Borough's housing targets set out in the recently adopted North West RSS, which as we explained in Section 3 are significantly higher than the rate of 80 dwellings per annum in the now-superseded JLSP. Another reason for taking an extensive approach is so as not to pre-empt the identification of appropriate areas for accommodating growth, which will be undertaken through the LDF preparation process. Furthermore, our approach is consistent with paragraph 7 of the Guidance which states that a SHLAA study should: *'aim to identify as many sites with housing potential in and around as many settlements as possible in the study area'*.
- 4.5 Notwithstanding the above, we take account of a site's location in relation to key services when we assess the 'suitability' of sites (see the 'Assessment Factors and Criteria Used to Assess Sites' Housing Potential', in Appendix 2). Thus, sites that are located in the Borough's largest settlements of Rawtenstall, Haslingden and Bacup fare better against the 'suitability of location' criterion than sites in other parts of the Borough, reflecting the wider range of key community services and facilities in the larger settlements.

Time Horizon

- 4.6 LPAs are required, by paragraph 53 of PPS3, to set out in LDDs their policies and strategies for delivering the level of housing provision required by the adopted RSS, or the emerging RSS if the adopted RSS is being reviewed. LPAs are required to *'identify broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.'*
- 4.7 Paragraph 54 of PPS3 states that LPAs *'should identify sufficient specific deliverable sites to deliver housing in the first five years'* from adoption of the relevant LDD. Paragraph 55 further states that LPAs should also *'identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated.'* In Sections 6 and 7, we provide details of the contribution to the Council's dwelling targets from sites which we have assessed as being 'deliverable', 'developable' or 'least developable'.
- 4.8 The requirements of paragraphs 53 to 55 of PPS3 are carried through into the Practice Guidance, paragraph 5 of which requires LPAs to *'identify specific, deliverable sites for the first five years of a plan that are ready for development'*. Paragraph 7 of the

Guidance further states that a SHLAA should '*as a minimum...aim to identify sufficient specific sites for at least the first 10 years of a plan, from the anticipated date of its adoption.*'

- 4.9 Thus, both PPS3 and the Guidance require LPAs to identify sites from the date of adoption of the relevant DPD. However, adoption of the Borough's Site Allocations DPD is not anticipated until January 2011¹¹. We have therefore necessarily used the study base date of 1 April 2008 as the starting point in assessing the 5 year land supply, rather than the DPD adoption date.
- 4.10 In accordance with the Guidance, the SHLAA should be regularly kept up-to-date as part of the Annual Monitoring Report exercise, so as to support the updating of the housing trajectory and the rolling five-year supply of specific deliverable sites.

Minimum Site Size Threshold

- 4.11 Analysis of National Land Use Database (NLUD) returns made prior to 2003 demonstrated that a 0.25ha size threshold would reduce the total number of sites by 50-60 per cent, while only reducing the total PDL land area by 3-4 per cent. Accordingly, a 0.25ha threshold was introduced to NLUD in 2003 (this applies across all of England except London, where a threshold of 0.1ha applies). English Partnerships' 0.25ha threshold had the desired effect; the number of sites returned by local authorities post-2003 decreased considerably but this had only a minimal effect on the total land area.
- 4.12 Accordingly in SHLAAs, we typically suggest a site size threshold of 0.25ha, with sites above this size typically being able to accommodate 10 or more dwellings. However, we understand that a minimum site size threshold was not used for the UPS undertaken in 2005, or for the Council's latest NLUD update. Furthermore, the second bullet under paragraph 25 of the Guidance states: '*in areas dominated by rural settlements, it may be necessary to identify all the sites with potential for housing*'. For the purposes of this study we have therefore applied a minimum site size threshold of 0.10ha, which was agreed in advance with the Council.

Sources of Potential Housing Sites

- 4.13 PPS3 sets a clear expectation that the supply of land for housing should be based upon specific sites and, where necessary, broad locations. The main tool used in the assessment was therefore our Microsoft Access database of sites with a recognisable opportunity for residential development. The database is used to store all the data gathered in the study and is coded to automatically assign each site to one of three 'Category' bands (corresponding to 'most deliverable', 'moderately deliverable' and 'least deliverable'¹²) based on the site's performance against pre-agreed assessment criteria (as described in Section 6 of our report). The database also generates a theoretical dwelling yield for each site.
- 4.14 Figure 4 of the Guidance provides a list of possible sources for identifying potential housing sites. The list includes sites that are already in the planning process as well as sites that are not currently in the planning process. In the early stages of the study we compiled an initial list of potential housing sites, drawing upon the sources listed in Figure 4, but broadening it slightly to include other sources.
- 4.15 The sources that we used to identify the initial list of sites are listed below; these sources are in addition to unimplemented/outstanding residential planning permissions, which are considered as a potential source of supply, irrespective of

¹ http://www.rossendale.gov.uk/downloads/Final_AMR_2006-2007.pdf

¹² These definitions are based on those specified in paragraphs 54 and 55 of PPS3, which are carried through into paragraphs 5 and 33 of the SHLAA Practice Guidance.

where the sites are located in the Borough (details of the supply from extant permissions are provided in Section 5 of our report):

- outstanding Local Plan housing allocations (of which there are nine);
- sites identified for potential disposal in the Council's Open Space Review;
- surplus employment land identified by the Council's Employment Land Review;
- the Urban Potential Study of 2005;
- sites identified through the 'call for sites' exercise which the Council undertook during February and March 2008 to inform its Site Allocations DPD, and other sites which have been submitted to the Council for consideration;
- sites identified in the Rawtenstall AAP or the Bacup, Stacksteads and Britannia AAP;
- the Council's latest NLUD return (2007);
- previously withdrawn and refused applications for new housing; and
- other sites brought to our attention by the Council.

- 4.16 Our initial list of potential housing sites - compiled from the sources listed above - contained almost 1,000 sites, although at that stage there was a significant amount of duplication (that is, sites that had been identified from multiple sources). We then removed: all duplicates¹³; sites below the minimum site size threshold of 0.10ha; and sites which the Borough Council considered to have no realistic prospects for housing.

The Sites Database

- 4.17 After applying the various filters described above, the initial list of potential housing sites was reduced to 426. These sites are distributed all around the Borough and include sites located within the urban area as well as sites outside of existing settlement boundaries. The list includes both greenfield and PDL sites, and some sites located within the Green Belt and other important policy designations. Appropriate consideration has been given to important policy designations and to the location of sites, as detailed in Section 6 of our report.
- 4.18 We visited each of the 426 sites in our database and assessed their potential for housing and the number of dwellings that could theoretically be provided at each site, taking into account the findings from our site visits.
- 4.19 As noted previously, the contribution to the housing supply of sites with planning permission is assessed through separate analysis (as detailed in Section 5 of our report). These 'committed' sites therefore do not feature in our database, although because the study has a base date of 1 April 2008, it is important to note that some of the sites in the database might have since been granted planning permission for residential use in the intervening period. This issue will be addressed through the first annual update of the study.
- 4.20 Each of the 426 sites is represented as a 'polygon' (i.e. an area with boundaries) on an OS base map in our MapInfo GIS. For each site a unique identifier was created and more detailed information on each of the 426 sites is contained in the associated Microsoft Access sites database, which is split into five parts as detailed below.

¹³ This process explains why the first site in our database is referenced '448', and why there are some gaps in the site numbering system.

Database Reference Fields

- 4.21 For each site, basic reference details and other factual information are always visible at the top of the database, whether Part 1, 2, 3, 4 or 5 of the database is selected. The standard reference fields are specified in Table 4.1 below.

Table 4.1 Sites Database - Reference Fields

Data Field	Form of Data/Possible Options
RTP unique ref	Sequential site numbering system, providing each site with a unique reference.
Source ref (if available)	Taken direct from Council or other sources.
Source type	Options are: Bacup Stacksteads and Britannia AAP; Call for Sites; Employment Land Study 2007; NLUD 2007; Open Space Review 2006; Open Space Strategy 2008; outstanding Local Plan housing allocations; Rawtenstall AAP; refused applications; Urban Potential Study 2005; and withdrawn applications.
Other source types (if available)	Other source(s) of site, only applicable if the site was identified through multiple sources. Same options as for 'source type'.
Grid reference	Easting and northing of the site centroid, generated by GIS
Site name & address	Site name (where applicable) and approximate address, based on the site's geographic location. Generated from GIS or entered manually if a Call for Sites submission.
General information/other comments	Free-text box which contains other relevant information and findings from site visits.

Database Part 1 - Site Details and Planning Status

- 4.22 The first part of the database contains a range of contextual and factual information about the sites (gross site area, land type, and so on), much of which was collected as a desk-based exercise and using GIS. This part of the database also contains our 'Overall Site Categorisation' rating for each site (1, 2 or 3). Details of how we prioritised sites are provided later in our report.
- 4.23 Our assessment of any permanent features that would be likely to affect the site's potential for housing development, based on the findings/observations from our site visits (which we completed in October 2008), is provided in the first part of the database.
- 4.24 The full list of fields/information contained within Part 1 of the database is shown in Table 4.2 below.

Table 4.2 Information Contained in Part 1 of the Sites Database

Topic	Data Field	Form of Data/Possible Responses
Site Details	Site area in hectares (gross)	Automatically created using GIS by measuring the area of land within the site polygon
	Land type	Greenfield or previously developed land
	Current land use	Options are: agriculture & related incl. forestry; community services; minerals; open space; industry & business; other*; recreation & leisure; residential; retail; transport); and utilities & infrastructure [*if 'other' is selected, details of the current land use are provided in a second free-text box].
	Surrounding land use	Options are: agriculture & related incl. forestry; community services; minerals; open space; industry & business; other; recreation & leisure; residential; retail; transport); or utilities & infrastructure
	Character of surrounding area	As assessed on site
	Other relevant site details	As assessed on site

Database Part 2 - 'Suitability' Information

- 4.25 The second part of the database provides details of any physical or bad neighbour constraints which might affect the site's potential for housing development, as well as our initial assessment of whether the site is suitable for housing only, or housing as part of a mixed-use development¹⁴.

Table 4.3 Information Contained in Part 2 of the Sites Database

Data Field	Form of Data/Possible Options
Access infrastructure	On-site assessment of whether extensive new access infrastructure would be required in order to facilitate housing development
Drainage infrastructure	On-site assessment of whether extensive new drainage infrastructure would be required in order to facilitate housing development
Ground condition constraints	On-site assessment of whether extensive ground treatment is likely to be required in order to facilitate housing development
Bad neighbour constraints	As assessed on site. Possible responses are 'none'; potential for 'mitigation'; or 'major constraints'
Mixed-use potential	Initial assessment of whether the site is suitable for housing only, or housing as part of a mix of uses

Database Part 3 - 'Availability' Information

- 4.26 In Part 3 of the database, we provide details of anything which we consider might affect availability, reflecting our observations from the site visits. We also identify whether the site is immediately available, and if not, whether it could be made available within 5 years. For a site to achieve an overall Category 1 rating, it would have to be capable of being made available within 5 years.

Database Part 4 - Yield Assessment

- 4.27 For each identified site it was necessary to estimate the potential housing yield. In order to do this, we applied a series of factors as detailed below. The differing percentages for each factor have been derived using our experience of previous developments in similar areas, and were agreed in advance with the Council.
- 4.28 For a small number of sites a yield figure was entered manually instead. The main example of this relates to call for sites submissions, which often specify the number of dwellings that the developer intends to provide at the site. With these sites, if the number of dwellings proposed would result in a development density that is appropriate in the local context, then we have inserted the yield figure manually.

(i) Gross site area

- 4.29 Where two or more sites contain areas that overlap, the common area of land is only considered as part of one site and is discounted from any others to avoid double counting. The gross site area specified in the database is the area within the digitised site polygon after this process was completed, measured using GIS.

(ii) Permanent features factor

- 4.30 A factor was then applied to represent the percentage of the gross site area likely to be available for housing after account has been taken of any special site specific capacity constraints relating (for example) to site shape, topography, obstructions to development (e.g. substations) or water bodies. Site constraints, and the appropriate percentage reduction, were assessed on a site by site basis for all 426 sites.

¹⁴ We return to this issue later in our report.

(iii) Gross to net factor

4.31 A gross to net factor was applied to the residual site area following application of the permanent features factor. The gross to net factor takes account of any requirements to provide supporting facilities on the site. We have adopted the most up-to-date advice on net density, namely that contained in Annex B of PPS3 which states that net dwelling density is calculated by:

'...including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas, where these are provided.'

4.32 For the largest sites (above 10ha), the gross to net factor that we applied was 50 per cent, to allow for significant additional infrastructure such as schools, community facilities, roads, green spaces and so on. For sites of between 0.4ha and 10ha, the amount of additional infrastructure required will be much less, and so a greater proportion of the site can be allocated to housing. Consequently, we have applied a less severe ratio for sites with a gross area of between 0.4ha and 10ha. For sites up to 0.4ha, the amount of additional infrastructure that is required is assumed to be negligible. This is because these sites should be capable of utilising existing infrastructure, and also because smaller sites will not generate a need for significant new supporting infrastructure. For sites with a gross area up to 0.4ha, we have therefore applied a gross to net factor of 100 per cent. Table 4.4 below sets out the specific gross to net ratios that we used.

4.33 PPG2 limits the redevelopment of PDL sites in the Green Belt to an area equivalent to the built footprint, but only for 'major developed sites'¹⁵. Paragraph C1 of Annex C to PPG2 provides a range of examples of major developed sites, including factories, collieries and power stations. For major developed sites we would therefore normally apply a bespoke gross to net ratio equivalent to the proportion of the site that is covered by built footprint.

4.34 It should be noted that, in reality, each site would be considered individually as and when it is taken forward for allocation or proposed for development. Nevertheless, the gross to net ratios that we applied for the purposes of our yield assessment are as set out in Table 4.4.

Table 4.4 Gross to Net Ratios

Gross Site Area (ha)	Percentage Net
Up to 0.4ha	100%
0.4ha to 2ha	90%
2ha to 10ha	75%
Over 10ha	50%
'Major developed sites' in the Green Belt	Area equivalent to the part of the site that is covered by built footprint

(iv) Mixed use factor

4.35 A mixed use factor was applied to sites most likely to be developed for mixed uses, to indicate the notional proportion of the net site's total capacity which is assumed to generate residential use, regardless of whether the mix of uses is horizontal or vertical. The majority of the sites that this factor applies to are located in Rawtenstall and Bacup town centres, and were identified through a combination of our site visits and officer knowledge.

4.36 The mixed use factor that we applied was 50 per cent in all cases. It is also possible to apply other mixed use factors (25 per cent, 75 per cent and 90 per cent). Whilst we

¹⁵ See paragraphs C4 and C5 of Annex C to PPG2.

have not applied these factors to any of the 426 sites in the database, the Council might prefer to apply one of these alternative factors to specific sites in future updates of the study, which is why we have incorporated this functionality into the database.

- 4.37 Again, each site would need to be considered in more detail on a case-by-case basis as and when it came forward for development. These sites will need a mixed use policy rather than a housing allocation and a separate employment allocation. In any event, as we indicated above, most of the sites in the database have been treated as pure housing sites.

(v) Density assumptions

Policy guidance

- 4.38 Paragraph 46 of PPS3 states that LPAs should develop housing density policies having regard to:
- the spatial vision and strategy for housing development in their area, including the level of housing demand and need and the availability of suitable land in the area;
 - the current and future level and capacity of infrastructure, services and facilities such as public and private amenity space, in particular green and open space;
 - the desirability of using land efficiently and reducing, and adapting to, the impacts of climate change;
 - the current and future levels of accessibility, particularly public transport accessibility;
 - the characteristics of the area, including the current and proposed mix of uses; and
 - the desirability of achieving high quality, well-designed housing.
- 4.39 Paragraph 47 of PPS3 states that while LPAs may wish to set out a range of densities across the plan area, 30 dwellings per hectare (dph) net should be taken as a national indicative minimum to guide policy development and decision-making, until local density policies are in place. Densities below this minimum will need to be justified according to such factors as those listed above.
- 4.40 The Secretary of State recommended that the RSS for the North West should include a policy on housing density, specifying a minimum of 30 dph with higher levels in urban areas. However, these proposals were not incorporated, and the recently published RSS contains no specific figures or recommendations regarding density of development in the region.
- 4.41 As we explained in Section 3, the Council produced an Interim Housing Policy Statement (IHPS) in December 2007, mainly to address concern over the oversupply of housing against the dwelling requirements prescribed by the JLSP and to provide guidance on how the Council intends to manage the release of housing land prior to the adoption of the emerging LDF,
- 4.42 The IHPS has now been revised in response to the housing targets set out in the recently published RSS, which at an average annual rate of 222 dwellings is significantly higher than the rate of 80 dwellings per annum (after 2006) in the now superseded JLSP. The 2008 IHPS therefore states that the Council will *'encourage and promote residential development'* under the following circumstances:
- within Regeneration Priority Areas and Main Development Locations, where the application uses PDL, makes a contribution towards affordable housing provision, and is built at a density of between 30 and 50 dph;
 - within the urban boundary of other settlements in Rossendale, provided the application is on PDL, makes a contribution towards affordable housing provision, is built at a density of no less than 30 dph, and would not undermine the focus for

most residential development to be within the Regeneration Priority Areas and Main Development Locations; and

- outside the urban boundary of other settlements in Rossendale, provided that proposals are for solely affordable and/or special needs housing, or where the accommodation is for agricultural or forestry workers.

Analysis of density trends

- 4.43 Data provided by the Council demonstrate the density of housing completions which took place between 2006 and 2008 for all sites of 0.10ha or greater¹⁶. At the outset it is important to emphasise that this is a relatively short timeframe, and so the Council's schedule contains details of only around 20 schemes. Thus, it is difficult to discern clear time-series trends in relation to residential development densities from the supplied data, given the relatively limited sample size and the short time period.
- 4.44 With the above proviso in mind, analysis of the data demonstrates that the majority of residential completions in the past couple of years have been at densities of less than 30 dph in all parts of the Borough. Distribution of completions across the higher density bands 30-49 dph and ≥ 50 dph is somewhat uneven, with the only completions of 50 dph or more taking place in Haslingden.
- 4.45 The high proportion of low-density completions across the Borough is a consequence of the topography of the area; the Borough's towns and villages are packed densely together in the steep-sided valleys of the River Irwell, and are surrounded by expanses of almost completely unpopulated moorland. Thus, opportunities for development are not as abundant as they are in local authority areas that have fewer topographical constraints.
- 4.46 Analysis of the data also shows that the highest average densities were achieved in the three settlements of Haslingden, Bacup and Rawtenstall. This reflects the larger nature of these settlements and the wider range of services on offer.
- 4.47 Larger sites exist outside the main centres and beyond the edges of the towns, although the densities achieved on these sites are much lower, reflecting the more rural nature of the areas involved.

Assumptions

- 4.48 The Council's supplied data indicate that recently completed schemes have been at relatively low densities, and we acknowledge that in practice achieving densities significantly above 30 dph at more rural sites might prove challenging. Nevertheless, the aspiration should still be to meet the minimum density recommended by PPS3 in all parts of the study area.
- 4.49 Our analysis indicates that the current density range across the Borough is generally of the order of <30 dph. As we have demonstrated, however, there are some exceptions where densities above 30 dph are being achieved. Furthermore, we consider that there may be an opportunity in the larger towns of Rawtenstall, Bacup and Haslingden to achieve densities in excess of 50 dph, particularly on the more central sites. Thus, in these towns, our view is that an achievable target would be in the order of 70 dph.
- 4.50 In the smaller towns of Whitworth and Edenfield, a more achievable target would be in the order of around 50-60 dph and no less than 30 dph. This reflects the smaller nature of these settlements and the range of key local services on offer.
- 4.51 In order to promote sustainable development, public transport should also be taken into account when determining housing densities. Consequently, for sites close to a high frequency bus route (defined as a bus stop at which an average of six buses or more per hour call during the period 0730-0930 on weekdays with a wait of no longer than fifteen minutes) the aspiration should be to achieve higher density development.

¹⁶ Sites of less than 0.1ha have been excluded from our analysis in order to prevent the figures being skewed.

- 4.52 The density assumptions that we used in assessing housing potential - which were agreed with the Council - are set out in Table 4.6 below.

Table 4.6 Net Density Rates Applied in the Rossendale SHLAA

Site Location Characteristics	Density (dph)
Within the defined Town Centres of Rawtenstall, Haslingden or Bacup	70
Within 400m of Rawtenstall, Haslingden or Bacup Town Centres or within the Town Centre of Edenfield or Whitworth	60
More than 400m from Rawtenstall, Haslingden or Bacup Town Centres but within the settlement boundary OR within 400m of Edenfield or Whitworth Town Centres or any high frequency bus stop	50
Between 400m and 800m of Edenfield or Whitworth Town Centres or any high frequency bus stop and outside the settlement boundaries of Rawtenstall, Haslingden or Bacup	40
More than 800m from Edenfield or Whitworth Town Centres or any high frequency bus stop and outside the settlement boundaries of Rawtenstall, Haslingden or Bacup	30

- 4.53 The housing capacity of any identified site is then calculated by:

Gross site area x permanent features factor x gross to net factor x mixed use factor x density

- 4.54 At the bottom of the fourth part of the Access sites database are two fields entitled 'Net residual site area available for housing (ha)' and 'yield'; these figures are the residual area and theoretical housing yield after the factors described above have been applied.
- 4.55 In practice, the Council will have to undertake more detailed work on the densities that are achievable at any given site, as and when it is brought forward for development. Furthermore, our guideline capacities for very large sites must be treated with caution as we can not foresee the mix of uses that they might be called on to accommodate. Nevertheless we consider that the consistent framework shown in the table above is appropriate for the purposes of this strategic assessment.

Database Part 5 - GIS-Based Information

- 4.56 Part 5 of the Access database contains scores for each site against a total of 14 assessment factors and criteria - consistent with the factors and criteria referred to on pages 16 and 17 of the Guidance - under the headings 'suitability', 'availability' and 'achievability'. The specific assessment factors and criteria, and the potential scores that could be assigned under each, are contained in full in Appendix 2.
- 4.57 The criteria are a combination of those for which a score can be generated automatically using GIS (such as whether the site is within the Green Belt or a particular Flood Risk Zone) and those for which we had to apply our professional judgement (for instance, in relation to the extent of physical constraints affecting the site). A score of between 0 and 5 was possible under each assessment criterion, whereby a major constraint and/or severe adverse impact scores 0 (minimum), and a significant positive feature or absence of adverse impact scores 5 (maximum). The use of a common scoring base ensures that, as far as possible, the scoring of sites is transparent and easily understood. Moreover, it highlights any potentially unacceptable aspect of the development of an individual site, irrespective of that site's overall assessment rating. Thus, the maximum score that a site could achieve is 70 (i.e. 14 criteria x 5).

- 4.58 It is therefore possible to compare individual sites' performance relative to other sites in terms of their overall 'score' out of 70. However, we caution against prioritising sites using a simple scoring approach. Whilst the GIS-based site assessment provides a good indication of each site's performance against a broad range of important measures, we consider that a supplementary assessment is still necessary to ensure that certain 'core' constraints are taken into full account. The information contained in Part 5 of the database is thus important, but only forms the first step in our site categorisation exercise (full details of which are contained in Section 6 of our report).
- 4.59 Furthermore, whilst paragraph 83 of the draft version of the SHLAA Guidance suggested that SHLAAs could '*develop an indicative rank of sites*', this was not carried through into the final version of the Practice Guidance. Thus, the individual scores in Part 5 of the database are provided for information purposes only (and have not been published in the SHLAA), so that the Council can see how sites perform against individual criteria, and in order to provide an indicative initial comparison of sites.

5 HOUSING COMMITMENTS, DEMOLITIONS AND UNDER- OR OVER-SUPPLY AGAINST RSS TARGETS SINCE THE RSS BASE DATE

Housing Commitments

What Are Housing Commitments?

- 5.1 Housing 'commitments' comprise dwellings with full or outline planning permission. The Council supplied a schedule of commitments at the study base date (1 April 2008) to inform our assessment of housing land availability in the present study. It is reasonable to assume that not all of the commitments in the schedule will be implemented and so we consider that there is a need to apply a non-implementation rate (any failure of specific commitments to be taken up can be dealt with through routine monitoring and supply management). We return to this issue, below.
- 5.2 If there were any outline permissions for large numbers of dwellings (i.e. over 100) where no dwellings were completed or under construction at the base date, then care would have to be taken because implementation of these permissions may potentially extend beyond five years. Housing production on such sites would need to be carefully monitored and sufficient appropriate allocations would need to be included in the LDF to allow for the possibility that they may not generate their full supply within the first five years. However, there were no such permissions in the Borough at the study base date; the largest pipeline schemes in the Borough at the base date were two outstanding outline permissions each for 50 dwellings.
- 5.3 Because the latest comprehensive data on residential commitments supplied by the Council relate to a base date of 1 April 2008, it should be noted that some of the residential planning permissions at the study's base date may now be partly or fully completed. This is unavoidable, however, and can be dealt with when the study is updated.
- 5.4 A number of housing allocations in the adopted Local Plan have not yet been implemented, and potential from these sources has therefore been reassessed as part of this study. Outstanding housing allocations from the Local Plan have thus been assessed in the same way as the other sites in our database.

Commitments at the Study Base Date

- 5.5 Information provided by the Council shows that at the study base date of 1 April 2008 there was permission for 2,124 net additional dwellings across the Borough. Of the total permitted dwellings 1,011 had been completed, and therefore 1,113 dwellings were still outstanding at the study base date (that is, they were either un-commenced or started but not completed) and could potentially form part of the Borough's future housing supply.
- 5.6 We assume that in such cases the number of dwellings built will be as given in the latest permission, although it is possible that these will be superseded by further approvals on the same sites.

Allowance for Non-Implementation

- 5.7 It is reasonable to assume that not all of the residential commitments will be implemented, particularly given the current downturn in the market. In order to ensure a robust approach, we therefore consider that there is a need to make an allowance for non-implementation of a proportion of the planning permissions. Applying a 'non-implementation rate' will ensure that the Borough's housing supply is not over-reliant on extant planning permissions ('commitments'), which may not all progress in practice. We suggested to our client that the application of a 20 per cent non-

implementation rate would be an appropriate approximation for the purposes of the study, and officers agreed with our suggested approach.

- 5.8 We have thus applied a 20 per cent non-implementation rate to the total outstanding housing supply (comprising both outline and full planning permissions). Table 5.1 shows that, after applying the non-implementation rate, the total realistic housing supply at 1 April 2008 from residential commitments in the Borough stands at 890 dwellings.

Table 5.1 Summary of Total Supply at 1 April 2008 - Taking into Account a Non-Implementation Rate (20 per cent)

No. of Dwgs Permitted	No. of Dwgs Completed at the Base Date	No. of Dwgs Still to be Built at the Base Date	No. of Dwgs Likely to be Built (assuming a 20% non-implementation rate)
2,124	1,011	1,113	890

Demolitions

- 5.9 Clearance figures supplied by the Council show that there were 44 demolitions in the five-year period 1 April 2003 (the base date of the RSS) to 31 March 2008, which equates to a five-year average of approximately 9 dwellings per annum. Furthermore, the Council envisages that there will be approximately 50 demolitions in each of the forthcoming 5-year periods, and so given that the dwelling targets in the RSS are 'net of clearance replacement', we consider that it is necessary to make an allowance for 150 dwellings to be cleared and replaced over the 15-year study period.

Consideration of Under- or Over-Provision Against the RSS Targets Since the Base Date of the RSS

- 5.10 As well as demolitions, there is also a need to take account of any under- or over-provision against the RSS targets since the base date of the RSS. This is because paragraph 5(i) of the CLG's advice note entitled 'Demonstrating a 5 Year Supply of Deliverable Sites' (12 April 2007) states that in order to identify the level of housing provision to be delivered over the following 5 years, LPAs should use provision figures in adopted development plans, '*adjusted to reflect the level of housing that has already been delivered*'.
- 5.11 As noted above, clearance figures supplied by the Council show that there were a total of 44 demolitions in the five-year period 1 April 2003 to 31 March 2008. We used these clearance figures to establish total net completions for the period 1 April 2003 to 31 March 2008. As Table 5.1 illustrates, the 967 net dwelling completions between the base date of the RSS and the SHLAA base date represents a shortfall of 143 dwellings vis-à-vis the five-year requirement of 1,110 dwellings net (based on the annual target of 222 dwellings prescribed by the RSS).

Table 5.2 Under-provision vis-à-vis RSS Dwelling Targets Arising Between the Base Date of the RSS (1 April 2003) and the SHLAA Study Base Date (1 April 2008)

Year ^a	Gross Dwg Completions (incl. conversions)	Total Demolitions	Net Dwg Completions	Shortfall or Surplus Against the RSS's Dwgs/yr Target (222 Dwgs Average) ^b
2003-04	218	8	210	-12
2004-05	251	24	227	+5
2005-06	206	5	201	-21
2006-07	114	4	110	-112
2007-08	222	3	219	-3
Totals	1,011	44	967	-143

^a For each year, the completions data relate to the period 1 April to 31 March

^b Minus figures indicate a shortfall, whereas positive figures indicate that the RSS target was exceeded

- 5.12 Given that the 143-dwelling shortfall against the RSS target (since 1 April 2003) is relatively modest, we consider it appropriate to apportion this to the first five-year period. With regard to demolitions, in accordance with information supplied by the Council, an allowance for 150 demolitions will be apportioned equally across the three five-year study periods (i.e. 50 in each five-year period).
- 5.13 The resultant 5, 10 and 15-year dwelling requirements - based on the figures contained in the RSS, the need to take account of likely demolitions, and the shortfall of 143 dwellings that occurred between 2003 and 2008 (which together equate to a total shortfall of 293 dwellings) - are set out in Table 5.3.

Table 5.3 Rossendale 5, 10 and 15-year Dwelling Requirements Based on Approved RSS Targets (adjusted to reflect under-provision since 2003 and allowing for likely demolitions)

First 5 Years		
Avg Dwgs/yr (first 5 yrs)	Allowance for Under-Provision Since 2003, and Expected Demolitions	5-Yr Dwg Reqt
222	193	1,303
First 10 Years		
Avg Dwgs/yr (second 5 yrs)	Allowance for Expected Demolitions	10-Yr Dwg Reqt
222	50	2,270
First 15 Years		
Avg Dwgs/yr (third 5 yrs)	Allowance for Expected Demolitions	15-Year Dwg Reqt
222	50	3,380

- 5.14 The figures contained in the third column of Table 5.3 are those that we work to in Sections 6 and 7 of our report, when assessing whether there are sufficient sites to meet the Council's dwelling targets.

6 HOUSING YIELD ASSESSMENT

Approach to Identified Sites

- 6.1 The assessment of housing potential from the sites identified in the database combines the calculation of theoretical dwelling yields for individual sites with the categorisation of those sites in terms of their likelihood of coming forward for development.
- 6.2 The database has been carefully checked to ensure it does not include any site duplication. As explained in Section 4 of our report, the database does not contain sites which have planning permission for residential development. Planning permissions therefore do not contribute to the housing yield total provided by the database, as all residential commitment sites are dealt with separately in the assessment (see Section 5 of our report for details).
- 6.3 All of the sites in the database are theoretically suitable for residential development. However, some of them are nevertheless subject to significant constraints which might restrict their likelihood of being brought forward as application sites, the likelihood of them being approved and the likelihood of them achieving their fully assessed capacity (yield) if they were to be approved. These factors will also affect whether it would be appropriate to allocate them in the LDF.
- 6.4 We subjected all of the sites in the database to a comprehensive GIS-based site assessment, as detailed in Section 4 of our report, scoring each site against 14 assessment criteria in order to derive an initial overall score (out of 70) for each site. The 14 assessment criteria measures are closely related to the 'suitability', 'availability' and 'achievability' criteria referred to on pages 16 and 17 of the Practice Guidance, and they reflect local circumstances¹⁷. Our GIS-based site assessment thus provides a good indication of each site's performance against a broad number of important measures, and forms the first step in our site categorisation exercise, whereby we have placed sites into one of three category bands as follows:
- **'Most deliverable sites'** - those sites which perform best in the assessment, and which therefore appear to be the most developable/deliverable. For brevity we refer to these sites as 'Category 1'.
 - **'Moderately deliverable sites'** - those sites which perform moderately well in the assessment. These sites can still be brought forward, but the constraints affecting them will need to be addressed. We refer to these sites as 'Category 2'.
 - **'Least deliverable sites'** - sites which are affected by severe constraints. These sites are not necessarily ruled out, but they face very significant constraints which would need to be overcome to make them deliverable. We refer to these sites as 'Category 3'.
- 6.5 Sites which obtain a score of 62 out of 70 or above in the initial assessment clearly perform well and are affected by the fewest constraints (scoring 0 or 1 in no more than one of the assessment criteria). Accordingly, we initially placed these sites into Category 1. Sites achieving overall scores of between 55 and 61 out of 70 perform moderately well against the assessment criteria, facing more significant constraints than the best-scoring sites but which still appear to be achievable/deliverable, and so we initially placed these sites into Category 2. Sites achieving low overall scores, of below 55 out of 70, perform least well against the assessment criteria, facing at least three significant constraints; therefore, in our initial categorisation exercise, these sites were initially rated as Category 3.

¹⁷ For instance, we have considered local Flood Risk Zones, nature conservation designations and bad neighbours.

- 6.6 As we explained in Section 4, although the GIS-based site assessment provides a good indication of each site's performance against a broad number of important measures, it is still necessary to undertake a supplementary assessment of the sites to ensure that certain 'core' constraints are fully taken into account.
- 6.7 Thus, we order the various core constraints - relating to bad neighbours, nature conservation, flood risk and whether the site is located in the Green Belt - and consider which are most easily overcome and which are more likely to prevent a site from coming forward. In the case of the latter, this is not to say that the constraint could not be overcome, rather that it is likely to delay the site coming forward until such time as it is possible, or worthwhile, to overcome the constraint.
- 6.8 Our approach to site categorisation is set out in the table at the rear of the Site Assessment Criteria Note, which is presented in Appendix 2. Each site was placed initially into Category 1, 2 or 3 on the basis of its overall performance in the GIS-based site assessment. However, if a site is affected by additional constraints of the types listed in the table at the rear of Appendix 2, these will tend to downgrade its categorisation as indicated. The overall categorisation of a site therefore depends on the particular combination of constraints affecting it.
- 6.9 Sites located within Flood Risk Zone 3a and greenfield sites in the Green Belt are automatically considered to be Category 3 sites, even if they are not subject to any other constraints. In the case of the Green Belt, even though this is a policy constraint rather than a physical constraint - and therefore is theoretically easier to address - it is nevertheless a nationally important policy designation. Green Belt should only be deleted where there is very strong justification and the minimum amount of land possible should be lost. Therefore, if there is sufficient housing supply to come forward from other sources, then there would be limited (or no) realistic prospect of greenfield sites in the Green Belt coming forward¹⁸.
- 6.10 Regarding flood risk, there is a clear sequential approach in PPS25 which we have reflected in our prioritising. Flood Risk Zones 1 and 2 are both acceptable locations for housing¹⁹ but under the sequential approach, Zone 1 is preferable to Zone 2. Accordingly, we have placed Flood Zone 1 sites into Category 1 and Zone 2 sites into Category 1. A Strategic Flood Risk Assessment (SFRA) is currently being undertaken, although the final study findings have not yet been published. However, the Council supplied us with the draft SFRA Flood Zone maps, which we have used to establish whether any sites are within Flood Zone 3b ('the Functional Floodplain', where housing development is effectively ruled out by PPS25). Any sites within Flood Zone 3b sites were automatically excluded from the study on that basis. Housing development can be acceptable in Flood Zone 3a, provided a PPS25 'Exception Test' is passed. Nevertheless, under the PPS25 sequential approach, Flood Zone 3a sites are the least preferred location for housing development and so we have given a Category 3 rating to any sites within Flood Zone 3a²⁰ (if more than 50 per cent of a site is covered by Flood Zone 3a, it will be deemed to be a Flood Zone 3a site).
- 6.11 PPS3 gives clear priority to housing on PDL rather than on greenfield sites²¹. However, greenfield and brownfield development can be regarded as complementary and the contribution of both will be required in order to meet projected demand in the long-term. We have therefore not made PDL/greenfield status a criterion for placing sites into Category bands, but have separately identified the theoretical yield from PDL

¹⁸ 'Major developed sites' in the Green Belt are a slightly different proposition, because for such sites PPG2 permits the redevelopment of an area equivalent to the built footprint (see paragraphs C4 and C5 of Annex C to PPG2).

¹⁹ See Table D.3 of PPS25.

²⁰ We used a 50 per cent threshold to determine whether a site is within a particular Flood Risk Zone; for instance, if more than 50 per cent of a site is covered by Flood Zone 3a, it will be deemed to be a Flood Zone 3a site.

²¹ See para 36 of PPS3.

and greenfield sites to allow us to examine their respective roles in meeting overall housing requirements.

- 6.12 We also considered bad neighbour and current occupier constraints in our 'secondary' categorisation exercise. Whilst these constraints are unlikely to prevent a site coming forward for development, they nevertheless require mitigation, which may affect the availability of a site for residential development. Sites facing these constraints have thus been downgraded to Category 2 or 3.
- 6.13 It is important to emphasise that for a site to achieve a Category 1 rating, it would need to be suitable, and available (or capable of being made available) within 5 years, and achievable.
- 6.14 The placing a site into Categories 1, 2 and 3 is intended to give a useful indication of the deliverability and potential timing of a site's development and, hence, its suitability for inclusion as an allocation in the LDF. Sites in Category 1, which have minimal constraints, are considered to be deliverable within the first five years. These sites are clear candidates for allocation. Sites in Category 2 have a limited level of constraints such that they are likely to be available for delivery after the first five years. These sites may be suitable for allocation, depending on their individual circumstances and on specific measures being proposed to overcome their constraints. Sites in Category 3 have more significant constraints; for these sites to be considered appropriate for development or for allocation it would have to be clearly demonstrated that the significant constraints could be overcome in order to make them deliverable..
- 6.15 However, the inclusion of a site in a higher Category should not be taken to represent a recommendation that it should be allocated in the LDF, as our categorisation process does not take account of all the policy considerations that are relevant in selecting sites for allocation. Equally, it should not be concluded that a site assigned to a lower Category band cannot come forward, or that it cannot be allocated for development. Rather, it would need to be demonstrated that the site's constraints could be overcome in order to secure its deliverability.

Assessment of Whether There is a Need to Make a Small Site Allowance

- 6.16 Paragraph 59 of PPS3 states that windfalls '*should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified. In these circumstances, an allowance should be included but should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends.*'
- 6.17 Where there is evidence of a high and consistent proportion of new dwellings generated on small sites, a case could be made for adopting a small site allowance as an element of the total housing requirement for the Borough. Based on information supplied by the Council we have assessed the level of production on sites below 0.10ha (the study site size threshold), and we conclude that supply from this source has been negligible. Furthermore, using a relatively low minimum site size threshold of 0.10ha has ensured a comprehensive approach to site identification.
- 6.18 For the above reasons, we do not consider that it is necessary to include a small site allowance for the purpose of this study. As we go on to explain in Section 7, the specific sites that we have assessed can easily meet the Borough's entire 15-year dwelling targets.

Site Yield by Category Band

- 6.19 Table 6.1 sets out the number of sites in each Category band and their potential combined yield. The table shows that Category 1 sites offer a potential yield of

4,195 dwellings, just under 40 per cent of which is on PDL. Category 2 sites offer a yield of 6,031 dwellings, of which about 27 per cent is on PDL. The theoretical supply from Category 3 sites is 8,613 dwellings. However, as we discuss below, many of these 'sites' are huge, are remote from the urban area and offer no realistic housing potential.

Table 6.1 Summary Yield Schedule from Categorised Sites, Rossendale Borough

	TOTAL YIELD	Dwelling Yield From PDL Sites			Dwelling Yield From GF Sites		
		Sites up to 10ha Gross	Sites Over 10ha Gross	Total	Sites up to 10ha Gross	Sites Over 10ha Gross	Total
Category 1	4,195	1,597	0	1,597	2,598	0	2,598
Category 2	6,031	1,654	0	1,654	3,972	405	4,377
Category 3	8,613	1,991	3,253	5,244	2,677	692	3,369
	18,839	5,242	3,253	8,495	9,247	1,097	10,344

- 6.20 In Table 6.2, sites within each Category band are further classified according to their gross site area into those below and those above 10 ha. This is because the database includes some large sites where a decision to allocate or approve development would have to be based on wider policy considerations than is the case with smaller sites. These considerations are likely to include the broad sustainability of the total development pattern, and strategic transport and other infrastructure capacity. Before such large sites could be proposed for allocation they would also require careful attention to their size, capacity and boundaries, which would be beyond the remit of this study.

Table 6.2 Detailed Yield Schedule from Categorised Sites, Rossendale Borough

Site Category	Site area	Total		PDL		GF	
		Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
1a	< 10 ha	4,195	163	1,597	68	2,598	95
1b	> 10 ha	0	0	0	0	0	0
2a	< 10 ha	5,626	141	1,654	50	3,972	91
2b	> 10 ha	405	1	0	0	405	1
3a	< 10 ha	4,668	114	1,991	58	2,677	56
3b	> 10 ha	3,945	7	3,253	5	692	2
TOTALS		18,839	426	8,495	181	10,344	245

- 6.21 Table 6.2 shows that of the 426 sites that we assessed, eight have a site area above 10 ha, offering a combined yield of 4,350 dwellings. None of these large sites are in Category 1 but one, offering a potential yield of 405 dwellings, is in Category 2. Thus, seven of the eight sites over 10 ha are in Category 3 (3,945 dwellings). Whilst five of the large sites in Category 3 are on PDL, they are all former quarries in isolated locations. The remaining three large sites are greenfield sites which are also outside of the urban area.
- 6.22 Categorisation schedules are set out in Appendices 3, 4 and 5, which identify the Category rating (1, 2 or 3) for all 426 of the sites, and also provide for each site: brief address details; the gross site area; and the theoretical housing yield (after allowance has been made for any site-specific physical constraints).
- 6.23 The plan in Appendix 6 shows, in schematic terms, the spatial distribution of Category 1, Category 2 and Category 3 sites. The plan shows that the vast majority of the Category 1 sites are located within or immediately adjacent to the urban area. Some of the Category 2 sites are also located within existing settlement boundaries although in a significant number of cases, development of the Category 2 sites would represent an expansion of the urban area. The plan in Appendix 6 also shows that most of the Category 3 sites are peripherally located; as we go onto demonstrate in

Section 7, there is no need for the Council to have to rely on any of these Category 3 sites to meet the RSS dwelling targets.

7 TOTAL HOUSING YIELD AND SITE CATEGORISATION

Introduction

- 7.1 In this section, we assess the identified potential that could contribute to housing supply over the next 15 years (which we then summarise in Table 7.1). The elements of potential comprise:
- i) sites with planning permission; and
 - ii) sites identified in this assessment as potentially suitable for housing.
- 7.2 Of the identified sites in (ii) above, those in Category 3 should be considered to represent real potential only when it has been demonstrated that the significant constraints affecting these sites - which could relate to physical, availability or achievability factors, or a combination thereof - can be mitigated or overcome to make them deliverable..

Adequacy of Housing Provision

Approach

- 7.3 We assess the adequacy of the identified potential for meeting the RSS housing dwelling targets over five-year periods from April 2008. As we explained in Section 5, we have adjusted the RSS dwelling targets to reflect the shortfall of 143 dwellings against the five-year requirement of 1,110 dwellings net (since 1 April 2003). Furthermore, because the dwelling targets in the RSS are '*net of clearance replacement*', we also consider it necessary to make an allowance for an additional 150 dwellings (above the RSS target) over the 15-year period, to reflect the likely demolitions in the Borough (and this is taken into account in Table 7.1 below).
- 7.4 The components of potential are also set out in Table 7.1, and are referenced as follows:
- PP = dwellings still to be completed at 1 April 2008 with outstanding planning permission at that date²²; and
 - C1, C2, C3 = potential of sites in Category bands 1, 2 and 3 respectively, suffixed 'a' for identified sites and 'b' for large sites (i.e. over 10 ha gross).
- 7.5 Table 7.1 sets out the build-up of the housing potential, over the 5-, 10- and 15-year study periods. Within each period, the yield from a combination of components is compared with the dwelling target from the RSS. Where a combination is sufficient to meet the RSS target, the yield and the number of additional identified sites which make up the yield is highlighted in green. Otherwise the yield and number of sites are left without colour. It is therefore immediately apparent to what extent the potential housing supply for a period is sufficient to meet the target.
- 7.6 The approach described above is adopted for both the total yield and the yield on PDL. It should be noted, however, that the yields for the latter include dwellings from planning permissions on greenfield as well as PDL sites. In treating PDL separately from greenfield yield, it is immediately apparent from the table whether and to what extent it is likely to be necessary to call on additional greenfield land to meet the RSS requirement, which is important because maximising the use of PDL is a key policy aim of PPS3.

²² As we explained in Section 5, we have applied a non-implementation rate of 20 per cent to all outstanding residential planning permissions (i.e. permitted dwellings which had not been completed at the study base date), and this is taken into account in Table 7.1.

7.7 As we made clear in Section 6, our site categorisation does not take account of all the policy considerations that are relevant in selecting sites for allocation, which are likely to include the broad sustainability of the total development pattern, and strategic transport and other infrastructure capacity. Thus, we have not undertaken any analysis to consider whether the Category 1 supply indicated in Table 7.1 is in the right place to meet strategic policy objectives. Similarly, we have not considered whether it would be better to remove the obstacles affecting Category 2 PDL and bring these sites forward in advance of Category 1 greenfield sites in order to limit encroachment into open countryside. These issues are beyond the scope of a SHLAA and will need to be considered through the LDF preparation process.

Yield Assessment

7.8 Table 7.1 indicates that the number of sites with outstanding planning permission in the Borough is not sufficient to meet the RSS target for the first five years. However, the RSS target can be reached with the use of some Category 1a sites (that is, sites in Category band 1, which are 10 ha or less in size). Indeed, the RSS target can be reached from a combination of outstanding planning permission sites (890 dwellings) and a few of the large pool of 68 Category 1a PDL sites that are deliverable within this period, which offers potential for 1,597 dwellings.

Table 7.1 Adequacy of Cumulative Housing Potential in Rossendale Borough, Forthcoming 5, 10 and 15-year Periods

Period	Component	Total		PDL	
		Yield	Additional Sites (i)	Yield (ii)	Additional Sites (i)
First 5 years	PP	890	0	890	0
	C1a	4,195	163	1,597	68
	PP+C1a	5,085	163	2,487	68
	RSS target (iii)	1,303		1,303	
First 10 years	PP	890	0	890	0
	C1a	4,195	163	1,597	68
	PP+C1a	5,085	163	2,487	68
	RSS target (iii)	2,270		2,270	
First 15 years	PP	890	0	890	0
	PP+C1a	5,085	163	2,487	68
	PP+C1a+C2a	10,711	303	4,141	117
	PP+C1a+C2a+C2b	11,116	304	4,141	117
	PP+C1a+C2a+C3a	15,379	417	6,132	175
	RSS target (iii)	3,380		3,380	

Notes:

(i) "Additional" = sites additional to those with planning permission

(ii) The purpose of the PDL yield column is to indicate the yield which can be achieved without granting further permissions on greenfield sites. As planning permission has already been granted for some greenfield sites, the figures in the PDL yield column will include some dwellings from extant planning permissions on greenfield land.

(iii) The RSS target figure incorporates an allowance for likely demolitions in the Borough, as well as an allowance for under-provision against the RSS targets which arose between the base date of the RSS (1 April 2003) and the SHLAA study base date (1 April 2008).

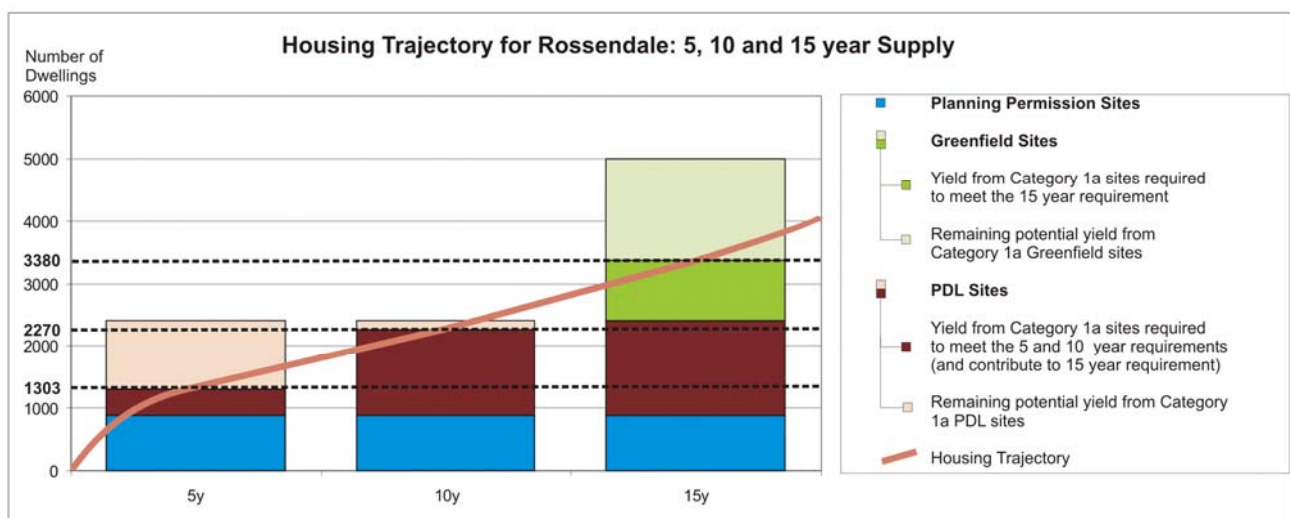
7.9 There is a need to make provision for a further 967 dwellings to cover the 10-year period. Again, the target can be reached by solely using the 67 Category 1a sites that are on PDL.

7.10 Provision for a further 1,110 dwellings needs to be made to cover the 15-year period. There is ample capacity from Category 1a sites, although in this case some greenfield sites would be needed. Alternatively, the target could be reached by using a

combination of PDL sites in Category bands 1a and 2a, without the need for any greenfield sites.

- 7.11 Thus, there is no need to use any of the more constrained Category 3 sites, even to meet the 15-year RSS target of 3,380 dwellings.
- 7.12 Figure 7.1 illustrates all of the above graphically in the form of an indicative housing trajectory (other permutations of yield to the example below are also possible but we have presented this one because it focuses on the most deliverable sites). The chart confirms that both the 5-year and 10-year targets can be met from a combination of outstanding planning permissions and some of the 67 Category 1a PDL sites. Outstanding planning permissions and Category 1a PDL sites are not quite sufficient to meet the 15-year target, but the chart shows that the target can be reached by using some of the 95 Category 1a greenfield sites, which offer a yield of 2,598 dwellings.

Figure 7.1 Indicative Housing Trajectory, Forthcoming 5, 10 and 15-year Periods



Summary

- 7.13 Over the entire 15-year period, the additional land needed to meet the housing requirements of the Borough under the targets prescribed by the RSS can be provided entirely by sites in Category 1a. Indeed, the Borough's 15-year housing requirement can be met just using PDL, when some Category 2a sites are taken into consideration.
- 7.14 There is no need, therefore, for any Category 3 sites (which we have judged to have serious constraints) to be allocated in order to meet the Borough's 15-year housing land requirements. Similarly, the Council will not have to be reliant on the development of the more strategic sites - that is, the 'large sites' with a gross area of 10 ha or above that we have identified, all of which are outside of the urban area - in order to meet its housing land requirements over the next 15 years.

8 SUMMARY OF MAIN STUDY FINDINGS

Introduction

- 8.1 We have undertaken a SHLAA study across Rossendale Borough. The purpose of the study is to establish whether there are sufficient suitable sites that are currently available (or likely to become available in the foreseeable future), which could meet the Borough's dwelling targets as prescribed by the recently adopted North West RSS.
- 8.2 The findings from the study can then be used by the Borough Council to allocate land for housing in its Local Development Framework. The outputs can also assist in annual monitoring, and will support the Council in meeting the requirement of PPS3 that *'the supply of land [be] managed in a way that ensures that a continuous five year supply of deliverable sites is maintained'*.
- 8.3 Below, we summarise the methodology that we employed in undertaking the SHLAA - which is consistent with the approach set out in the CLG's Practice Guidance of July 2007 - and then we pull together the headline findings from the study.

Key Strategic Policy Issues

- 8.4 Table 7.1 of the RSS for the North West specifies a requirement for 4,000 dwellings (net gain, after clearance) in Rossendale over the period 2003 to 2021. This equates to an average net gain per annum of 222 dwellings, which represents a substantial increase from the level of supply previously set out in the now-superseded Joint Lancashire Structure Plan (of 80 dwellings a year, after 2006).
- 8.5 The RSS does, however, explain that the overall housing requirement figures for the period 2003 to 2021, and that the annual average figures are not 'absolute targets', and may be exceeded where appropriate. This lays the foundations for a more flexible approach to housing provision at the local level, allowing local authorities to introduce phasing policies, for example, and meaning that the annual housing figures may be exceeded, *'where justified by evidence of need, demand, affordability and sustainability issues and fit with relevant local and sub-regional strategies'*.
- 8.6 The RSS aims to *'provide for a range of good quality housing, accessible for local facilities'*, and prioritises the Elevate Housing Market Renewal (HMR) Pathfinder area (which includes Bacup, Stacksteads and Britannia). The dwelling target for Rossendale set out in the RSS represents an increase on the requirements specified in the now-superseded JLSP. This has clear implications for the amount of land that will need to be identified for housing in the Council's emerging LDF.
- 8.7 A central priority of the Council's emerging Core Strategy is thus to deliver the HMR agenda in the Borough by achieving a balance between strengthening areas which currently have weak housing markets - principally including Bacup, Stacksteads and Britannia - and ensuring the delivery of enough new housing across the Borough as a whole to fulfil strategic policy requirements. This may, however, be challenging given the Borough's topographical and infrastructure constraints, as well as the negative perception of some settlements towards the east of the Borough.
- 8.8 The Borough Council's updated Interim Housing Policy Statement (July 2008) provides guidance on the release of housing land in light of the higher dwelling targets set out in the RSS, and the strategic challenges summarised above. The IHPS, in line with the Council's emerging Core Strategy and AAP for Rawtenstall, encourages residential development within Main Development Locations - which broadly translates into the Borough's urban areas - and the Regeneration Priority Areas of Rawtenstall Town Centre and the Bacup, Stacksteads and Britannia Elevate HMR area.

Study Parameters and Technical Issues

- 8.9 The SHLAA study covers the entire area within the administrative boundary of Rossendale. We have taken a comprehensive approach and have considered sites within and around the Borough's 39 settlements. We consider that such an extensive approach is necessary given the increased housing targets set by the RSS, vis-à-vis the JLSP.
- 8.10 The base date for the study is 1 April 2008, and for the purposes of identifying sites we adopted a minimum size threshold of 0.10 ha. After applying various filters, we identified some 426 potential housing sites within and around the Borough's 39 settlements. We visited each of these sites and recorded details of any physical constraints which might affect the site's suitability for housing development, as well as details of anything that might affect availability or achievability.
- 8.11 In order to estimate the potential housing yield of identified sites, we took account of any permanent features or physical constraints that may affect residential development of the site, as well as the likelihood of each site being developed for a mix of uses (both of which would reduce the number of dwellings that could be accommodated at the site, compared with a housing-only scheme).

Housing Yield Assessment and Site Categorisation

- 8.12 We subjected all of the sites in the database to a comprehensive GIS-based site assessment, scoring each site against 14 different measures in order to derive an initial score out of 70 for each site. The 14 measures are closely related to the 'suitability', 'availability' and 'achievability' criteria referred to in the Practice Guidance.
- 8.13 Sites obtaining a high overall score of 62 out of 70 or above in the initial assessment clearly perform well against most of the assessment criteria, and are affected by the fewest constraints (scoring 0 or 1 in no more than one of the assessment criteria). Accordingly, we initially placed these sites into Category band 1. Sites achieving overall initial scores of between 55 and 61 out of 70 face more significant constraints than the best-scoring sites but are still apparently achievable/deliverable, and so we initially categorised these sites as Category 2. Sites achieving low overall scores, of below 55 out of 70, perform least well against the assessment criteria, facing at least three significant constraints; therefore, in our initial categorisation exercise, these sites were initially rated as Category 3.
- 8.14 Although the initial site assessment described above provides a good indication of each site's performance against a broad number of important measures, it was necessary to undertake a supplementary assessment of the sites to ensure that certain core constraints are taken into account. Thus, if a site is affected by additional constraints (of the types listed in the table at the rear of Appendix 2), these will tend to downgrade its position in the three Category bands as indicated. The overall categorisation of a site therefore depends on the particular combination of constraints affecting it. Greenfield sites located within the Green Belt, and Flood Risk Zone 3a sites, were automatically considered to be Category 3 even if they are not subject to any other constraints.
- 8.15 Sites in Category 1 have no (or minimal) suitability constraints, are immediately available (or capable of being made available within 5 years), and perform well in relation to our achievability criteria. Accordingly, these sites are considered available for delivery within the first five years, and are clear candidates for allocation. Sites in Category 2 have a more significant level of constraint and/or are not likely to become available within 5 years and so, in accordance with the advice in the Guidance (paragraph 33), they are not currently 'deliverable'. However, the constraints that are holding Category 2 sites back are not considered to be insurmountable and so it is likely that they could be made available for delivery after the first five years. Category 2 sites may therefore be suitable for allocation, depending on their individual

circumstances and on specific measures being proposed to overcome their constraints. Sites in Category 3 have more significant constraints; for these sites to be considered appropriate for development or for allocation it would have to be clearly demonstrated that the significant constraints could be overcome in order to make them deliverable.

- 8.16 The headline findings from our site categorisation exercise are set out below and are summarised in Table 8.1.

Yield Assessment

- 8.17 The supply from outstanding planning permissions in the Borough (890 dwellings, after a 20 per cent non-implementation rate has been applied) is not sufficient to meet the RSS requirement for the first five years. However, the RSS target can be reached with the use of some Category 1a sites (that is, sites in Category band 1, which are 10 ha in size or less). Indeed, the five-year RSS target can be reached from a combination of outstanding planning permission sites and the 67 Category 1a PDL sites (which offer a potential yield of 1,597 dwellings).
- 8.18 Provision for a further 967 dwellings needs to be made to cover the 10-year period. Again, the target can be reached by using the 67 Category 1a sites that are on PDL. Provision for a further 1,110 dwellings needs to be made to cover the 15-year period. There is still ample capacity from Category 1a sites, although in this case some greenfield sites would be needed. Alternatively, the target could be reached by using a combination of PDL sites in Category bands 1a and 2a, without the need for any greenfield sites.
- 8.19 Over the entire 15-year period, the additional land needed to meet the housing requirements of the Borough can thus be provided entirely by sites in Category bands 1a and 2a, and can entirely be met on previously developed land if the constraints which are affecting the PDL sites in Category 2a are taken into consideration. There is no need, therefore, for any Category 3 sites (which we have judged to have serious constraints) to be allocated in order to meet the Borough's 15-year housing land requirements.

Summary of Requirement for Allocations to Meet the Dwelling Targets Prescribed by the RSS

- 8.20 Table 8.1 outlines the likely requirement for additional allocations in the Borough, for each five-year period, after an allowance has been made for existing planning permissions²³. For instance, it is apparent from the table that the number of dwellings from outstanding planning permissions in the Borough is insufficient to meet the RSS requirement for each of the five-year time intervals considered. As such, the table shows that there will be a need to allocate land for housing in order to meet the shortfalls against the 5-, 10- and 15-year RSS dwelling targets, of 413 dwellings, 1,380 dwellings and 2,490 dwellings, respectively. However, as we have demonstrated, there is sufficient land in Category bands 1 and 2 to meet these targets.

²³ As we explained in Section 5, we have applied a non-implementation rate of 20 per cent to all outstanding residential planning permissions, and this is taken into account in Table 8.1

Table 8.1 Summary of Likely Requirement for Additional Allocations, After Allowance for Outstanding Planning Permissions

Period	Components	Adequacy of Supply
First 5 years	<i>RSS Target</i>	<i>1,303</i>
	PP sites	890
	Shortfall re RSS Target	413
First 10 years	<i>RSS Target</i>	<i>2,270</i>
	PP sites	890
	Shortfall re RSS Target	1,380
First 15 years	<i>RSS Target</i>	<i>3,380</i>
	PP sites	890
	Shortfall re RSS Target	2,490

Note:

Supply from planning permissions is after a 20% non-implementation rate has been applied.

Large Sites

- 8.21 Our database includes some 'large sites' (with a gross area above 10 ha) where a decision to allocate land or approve development would have to be based on wider policy considerations than is the case with smaller sites. These considerations are likely to include the broad sustainability of the total development pattern, and strategic transport and other infrastructure capacity. Before large sites such as these could be proposed for allocation they would also require careful attention to their size, capacity and boundaries, which is beyond the remit of this study.
- 8.22 In total, eight large sites have been identified in the Borough, offering a combined yield of 4,350 dwellings. None of them are in Category 1 but one, offering a potential yield of 405 dwellings, is in Category 2. Thus, seven of the eight large sites are in Category 3 (3,945 dwellings). Whilst five of the large sites in Category 3 are on PDL, they are all former quarries in isolated locations. The remaining three large sites are greenfield sites which are also outside of the urban area.
- 8.23 Our analysis has shown that there is no need to consider any of the large sites for residential development.

